



William P. Deni, Jr.
Director

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June 1, 2021

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Krishanthi, et al. v. Rajaratnam, et al.*
Civil Action No. 09-05395 (BRM)(JSA)

Dear Judge Allen:

We represent Defendants in the above referenced matter. We write in connection with the Court's Order, dated May 18, 2021, which granted the parties' request for a two-week extension of time to file either a joint proposed Amended Scheduling Order or a joint letter identifying any scheduling disputes that remain. *See* ECF No. 454; ECF No. 455; ECF No. 456.

The parties have conducted multiple meet and confer sessions to address, among other things, the numerous outstanding and often years overdue discovery obligations for Plaintiffs and their agents, the Former JTTF Agents. In consultation with Plaintiffs' counsel, we provided them with two detailed deficiency letters dated May 21, 2021 specifying these items. We have received no response to date.

We proposed to Plaintiffs' counsel that we jointly request an additional two week extension of time to explore a joint submission with respect to scheduling. We made this suggestion in the hopes of further resolving, or at least narrowing, the issues in dispute. Plaintiffs' counsel would not agree to an additional two weeks.

We respectfully request that the Court grant an extension of the time to propose a joint schedule of two weeks after Plaintiffs respond to and satisfy the obligations outlined in the deficiency letters provided to them.

We thank Your Honor for your consideration of this request and have provided a SO ORDERED signature block on the following page for Your Honor's convenience.

GIBBONS P.C.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'WPDJ', with a long, sweeping horizontal stroke extending to the right.

William P. Deni, Jr.

cc: All Counsel of Record (via ECF)

SO ORDERED: _____